

Schary, Claire

From: Schary, Claire
Sent: Wednesday, July 16, 2014 6:04 PM
To: Carrie Sanneman; hbre461@ECY.WA.GOV; Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington
Subject: RE: Revisions to Recommendations
Attachments: Recommendations on WQT_ThirdDraft_2014 06 30 (TFT WP ECY)_7-11 changes following ECY meeting-HB&CS-2.docx

I finally finished reading the rest of the document (except for the Glossary and the Appendices – my brain is too full) and put my edits and comments in the same version of the document I sent you Tuesday with only the Section 2 comments (but now the long file name has “HB&CS-2” at the end, to distinguish it from Tuesday’s version). If it was something not important – i.e., a punctuation or very minor word change for better sentence construction – then I just edited it directly in track changes. If it was worth drawing your attention to, then I put in a comment. Sorry I didn’t use some bright highlighter color to draw your attention to all my changes, but I’m just proud I could get through the entire document in one day.

While I was in the middle of that, I got the latest revisions Carrie sent, so I am sorry that she now has to merge two documents. To make it easier, I am showing my comments on those last round of edits below, rather than inserting them into the document.

Overall, though, I want you to know that, after not looking at this for five weeks, I’m very impressed with the complexity of the topics we tackled, and how clearly it reads to me, a highly motivated reader. Others may still get blurry-eyed from the density of the material, but I think it’s the level of detail that needs to be covered for states that are ready to move on to the true challenges of designing PS-NPS trading programs. We just need to recommend to people that they not try to read it all at once. I look forward to testing it in our pilot projects, and also see what kind of constructive comments and feedback we will get! In the meantime, I really mean it when I say you did an amazing job of organizing our disparate thoughts into something that is quite coherent – good job! (And I like the layout, including the arrow at the bottom that I asked for.)

-- Claire

Claire Schary
schary.claire@epa.gov / (206) 553-8514

From: Carrie Sanneman [mailto:sanneman@willamettepartnership.org]
Sent: Wednesday, July 16, 2014 3:50 PM
To: hbre461@ECY.WA.GOV; Schary, Claire; Bobby Cochran; Joe Furia; Karin Power; Neil Mullane; Tim Wigington
Subject: Revisions to Recommendations

Hi all,

We’ve kicked around your proposed changes. We are good with most of them, and have come up with the following feedback. All new changes are shown in **bright green highlight**. Let us know how you feel about these, and note that we will do a sweep for formatting and internal cross-references once the we are finished with the revision cycles.

Getting closer and closer! Thanks!
Carrie

- Removed “or mixing zone” from Section 1.2.2, #2 per Susan’s comment

Claire: OK

- Small omission to the direct quote that Helen added, leaving out reference to point source waste load allocation, as that is not the focus here and may be confusing.

Claire: It seems too odd to edit a direct quote from EPA’s Trading Policy – so I say leave the reference to PS WLA in, even though it may be not be directly relevant to this discussion.

- SC9 – Clarifying edit re: Claire’s comment that it was confusing

Claire: OK

- Added a couple “and/or” in – see paragraph w/SC9 and in FN called out by HB10

Claire: OK

- FN 85 v. 91 consistency – see my edits to FN 91. I pulled out the TMDL LA, TMDL imp plan and settlement pieces b/c this FN is just talking about non-state baseline sources and the need to continue to comply with those other requirements.

Claire: OK

- Section 2.1 intro, just added in “control” into “general nonpoint source control authority”

Claire: OK

- SC16 – made stylistic edits to Claire’s changes

Claire: OK

- SC19 – Revised the example that Claire’s added to avoid confusion between baseline requirements and trading ratios.

Claire: I think I misunderstood the point you were trying to make with the original sentence. I’m not sure I understand it now either – what do you mean by the PS having to buy credits to meet baseline requirements? I think you mean paying for the NPS’ baseline requirements. I think it needs a bit more explanation.

- SC20 – Given that this is an example (starts with "In some trading contexts..."), we don't feel that this affects how a zero discharge scenario would play out. Suggest retaining existing text.

Claire: Let’s leave it out for now, and Helen and I want to flesh out the idea a bit more, perhaps as WA’s pilot project. We can see if it’s worth bringing into the final version a year from now. (Helen, are you OK with that?)